## UNITED STATES BANKRUPTCY COURT DISTRICT OF RHODE ISLAND

In Re: Christopher B. Pemental

Chapter 7 No. 07-11093

Debtor

## DEBTOR'S OBJECTION TO MOTION OF FIRST HORIZON HOME LOAN CORPORATION FOR RELIEF FROM STAY

The Debtor hereby objects to the Motion of First Horizon Home Loan Corporation for Relief from Stay, and hereby respectfully state as follows:

- 1. The Debtor believes that, through the assistance of relatives and friends, he will be able to bring the first mortgage obligation with First Horizon Home Loan Corporation current, including any arrearages, within a reasonable period of time, and he further states that there is equity in favor of First Horizon Home Loan Corporation, and it is otherwise adequately protected.
- 3. The Debtor currently resides at this property at 66-68 County Road in Barrington, Rhode Island, upon which this creditor is attempting to foreclose.

Christopher B. Pemental By his Attorneys,

August 1, 2007

/s/ Matthew J. McGowan
Matthew J. McGowan, Esq.
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(Bar No. 2770)

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No. 07-11093

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have this date electronically filed the **DEBTOR'S OBJECTION TO MOTION OF FIRST HORIZON HOME LOAN CORPORATION** in this case with the Clerk of this Court using the CM/ECF System. The following are CM/ECF System participants in this case eligible to receive notice of the filing of such paper(s) electronically:

Leonard J. DePasquale, Esq. <u>ustpregion01.pr.ecf@usdoj.gov</u>

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Andrew S. Harmon, Esq. <a href="mailto:ribk@harmonlaw.com">ribk@harmonlaw.com</a>

I further hereby certify that I have this date served a copy of the above-referenced paper(s) on the following non CM/ECF participants by first class mail, postage prepaid, at the addresses noted below:

First Horizon Home Loan Corporation P.O. Box 630664 Mail Code: 6206 Irving, TX 75063

Wilshire Credit Corporation P.O. Box 1650 Portland, OR 97207-1650

August 1, 2007 /s/ Matthew J. McGowan